

ALLTEL CORPORATION

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March 22, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, SW
Washington, DC 20554

Re: Limited Waiver of Truth-in-Billing and Billing Format
Requirements, CC Docket 98-170

Dear Ms. Salas:

Enclosed for filing by ALLTEL Communications Services Corporation, on behalf of its incumbent local exchange carrier affiliates and its competitive local exchange carrier affiliates (the "ALLTEL Companies") are original and four copies of a petition for limited waiver of the April 1st implementation date of Section 64.2401 (a) and Section 64.2401 (c) of the Commission's Rules. The sections in question involve certain requirements adopted in the Commission's Truth-in-Billing and Billing Format proceeding, CC Docket 98-170.

Please note that expedited treatment of this petition for waiver is requested.

Should there be any question regarding this matter, please contact the undersigned counsel.

Sincerely,

Carolyn C. Hill

Counsel for the ALLTEL Companies

Enclosures

CC w/encl.
Mr. Glenn Reynolds
Ms. Kathryn Schroeder
ITS

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
the ALLTEL Companies')
Request for Limited Waiver)
of the Truth-in-Billing and Billing Format)
Requirements of Sections 64.2401 (a))
and 64.2401(c) of the Commission's Rules)

CC Docket: 98-170

Expedited Treatment Requested

PETITION FOR LIMITED WAIVER
OF THE ALLTEL COMPANIES

ALLTEL Communications Services Corporation, pursuant to Section 1.3 of the Commission's Rules, 47 CFR Section, 1.3, hereby submits the instant waiver request on behalf of its incumbent local exchange carrier (ILEC) affiliates and its competitive local exchange carrier (CLEC) affiliates identified on Exhibit A (hereinafter the "ALLTEL Companies"). The waiver request is with respect to the April 1st implementation date of the requirements of Section 64.2401 (a) and (c) of the Commission's Rules. Specifically, Section 64.2401(a) requires that the service provider associated with each charge must be clearly identified on the end user's bill while Section 64.2401 (c) requires identification of charges as "deniable" or "non-deniable" on carrier billing statements. As demonstrated below, the ALLTEL Companies satisfy the good cause standard set forth in WAIT Radio v. FCC, 418 F2d 1153,1159 (DC Cir. 1969).

The ALLTEL Companies are small and mid-sized ILECs and CLECs that serve approximately 2.38 million access lines in 16 states. They have four different billing platforms that are impacted by the Commission requirements scheduled to go into effect on April 1st. As the Commission is aware, carriers, such as the ALLTEL Companies, were engaged until recently in the testing, implementation, and follow-up of their efforts to ensure that their operating systems and equipment met the Y2K date roll-out. This was a formidable, but necessary undertaking involving all segments of their operations. Freezes were implemented with respect to any changes in existing systems, including billing platforms, as well as system additions.

It is only in recent weeks, with the confirmation of the successful implementation of their Y2K compliance programs, that the ALLTEL Companies have been able to fully focus on consideration of any needed modifications to their system and billing platforms with respect to the highlighting of new service providers on their bills as well as the identification of charges as "deniable" or "non-deniable". After extensive review, it has been determined that implementation by April 1st of these requirements is not feasible. For this reason, a waiver of limited duration is respectfully requested.

There has been extensive debate within the industry as to the ability of carriers to comply with the "highlighting" requirements of Section 64.2401(a) of the Rules. None of the four platforms in use with ALLTEL has this capability now. This is not a situation unique to the ALLTEL Companies. An attempt to see if an industry solution could be reached was undertaken by the Order and Billing Forum (OBF). However,

despite OBF's expedited consideration of this matter, what exists now is only a proposal. The OBF module remains to be tested and a determination made that it can be successfully implemented by the industry. For this reason, the ALLTEL Companies are requesting a waiver of implementation of the highlighting requirements of Section 64.2401 (a) until they have had the opportunity to fully analyze, test, and if successful, to implement the OBF module. Currently, it is expected that this can be done by October 31st. The ALLTEL Companies will promptly advise the Commission if the module cannot be implemented by that date and another solution is therefore needed.

With respect to the requested waiver of the Section 64.2401(c) regarding “deniable” and “non-deniable” charges, it should be pointed out that the same four billing systems impacted by the “highlighting” requirement are also affected by the “deniable – nondeniable” requirement. Some of these systems were acquired in the last few years in conjunction with ALLTEL Corporation's acquisition of various local exchange carriers. The ages of these systems as well as the ones already in use within ALLTEL vary as do their technology platforms. Consequently, the types of changes needed to implement the Commission's requirements will not be the same for each of the billing systems. The situation is further complicated by the fact that some state jurisdictions in which ALLTEL Companies operate have adopted billing differentiation regarding “deniable” and “non-deniable” charges. Consequently, a waiver of the April 1st compliance date with Section 64.2401 (c) is respectfully requested until October 31st. By that date, all of the ALLTEL Companies plan to have implemented the required modifications to their billing systems.

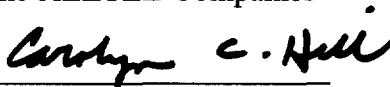
The ALLTEL Companies submit that a grant of this limited waiver is in the public interest because it will result in their having the time necessary within which to implement the required changes to their billing systems and platforms. The public will be the ultimate beneficiary as they will receive bills that reflect both federal and state requirements in a format designed to enhance their understanding of who their service providers are as well as their payment obligations.

In light of the scheduled April 1st implementation date, expedited treatment of this waiver request is respectfully requested.

Respectfully submitted,

The ALLTEL Companies

By:



Carolyn C. Hill

Their Attorney

601 Pennsylvania Ave., N.W.

Suite 720

Washington, DC 20004

(202) 783-3970

Dated: March 22, 2000

ALLTEL Companies

<u>ALLTEL Incumbent Local Exchange Carriers</u>	<u>Billing System Used</u>
Aliant Communications Co. d.b.a. "ALLTEL"	BPS
ALLTEL Alabama, Inc.	CAMS
ALLTEL Arkansas, Inc.	CAMS
ALLTEL Carolina, Inc.	CAMS
ALLTEL, Florida, Inc.	CAMS
ALLTEL Georgia, Inc.	CAMS
ALLTEL Georgia Communications Corp.	CAMS
ALLTEL Kentucky, Inc.	CAMS
ALLTEL Mississippi, Inc.	CAMS
ALLTEL Missouri, Inc.	CAMS
ALLTEL New York, Inc.	CAMS
ALLTEL Ohio, Inc.	CAMS
ALLTEL Oklahoma, Inc.	CAMS
ALLTEL Pennsylvania, Inc.	CAMS
ALLTEL South Carolina, Inc.	CAMS
Georgia ALLTEL Communicon Co.	CAMS
Georgia ALLTELCOM Co.	CAMS
Georgia ALLTEL Telecom Inc.	CAMS
Georgia Telephone Corporation	CAMS
Oklahoma ALLTEL, Inc.	CAMS
Standard Telephone Company	CAMS
Sugar Land Telephone Company	DPI
Texas ALLTEL, Inc.	CAMS
The Western Reserve Telephone Company	CAMS
 <u>Competitive Local Exchange Carriers</u>	
ALLTEL Communications, Inc.	CAMS / VII
Aliant Midwest, Inc. d.b.a. "ALLTEL"	BPS
360 Communications Company of Charlottesville d.b.a. "ALLTEL"	CAMS / VII

Certificate of Service

I, Payquith White, hereby certify that on this 22nd day of March 2000, copies of the foregoing Petition for Limited Waiver of the ALLTEL Companies were served by hand, or by courier, or via facsimile on the following:

Via Facsimile and Courier

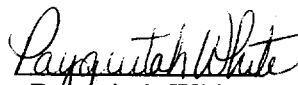
Mr. Glenn Reynolds, Chief, Market Dispute Resolution Division
445 Twelfth Street, SW
Room 5-A865
Washington, DC 20554

Via Facsimile and Courier

Ms. Kathryn Schroeder, Deputy Chief
Accounting Policy Division
445 Twelfth Street, SW
Washington, DC 20554

Via Hand Delivery

ITS
1231 20th Street, NW
First Floor
Washington, DC 20036


Payquith White